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and Andrew Boggeri*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JUSTOURS, INC., a Delaware
corporation; PUERTO VALLARTA
ACQUISITIONS, INC., a Delaware
corporation;

Plaintiffs,

v.

BOGENIUS GROUP, LLC, a California
limited liability company; ANDREW
BOGGERI, an individual; DOES I through
X; and ROE CORPORATIONS I through
X,

Defendants.

CASE NO.: 2:17-cv-00078-GMN-CWH

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME TO HOLD
FED. R. CIV. P. 26(f) CONFERENCE AND
SUBMIT DISCOVERY PLAN PENDING
THE RESOLUTION OF THE MOTION TO
COMPEL ARBITRATION**

(First Request)

Defendants Bogenius Group, LLC and Andrew Boggeri (collectively, the "Defendants"), by and through their counsel of record, the law firm of Peterson Baker, PLLC, and Plaintiffs JusTours, Inc. and Puerto Vallarta Acquisitions, Inc. (collectively, the "Plaintiffs"), by and through their counsel of record, the law firm of Hogan Hulet PLLC, hereby state as follows:

1. On November 30, 2016, Plaintiffs filed their Complaint in the Eighth Judicial District Court, Clark County, Nevada (Case No. A-16-7674390-C).

2. On January 9, 2017, Defendants filed their Notice of Removal Pursuant to 28 U.S.C. §§ 1332, 1441, and 1445 [ECF No. 1];

3. On January 17, 2017, Defendants filed their Motion to Compel Arbitration [ECF No. 5];

1 4. On January 24, 2017, Defendants filed their Statement Regarding Removal [ECF
2 No. 6];

3 5. On January 31, 2017, Plaintiffs filed their Response to Defendants Bogenius Group,
4 LLC and Andrew Boggeri's Motion to Compel Arbitration [ECF No. 7];

5 6. On February 7, 2017, Defendants filed their Reply in Support of Motion to Compel
6 Arbitration [ECF No. 9];

7 7. On February 8, 2017, the Parties filed a Joint Status Report [ECF No. 10];

8 8. Pursuant to LR 26-1, the Rule 26(f) Conference must be held within thirty (30) days
9 after the first defendant answers or otherwise appears, and fourteen (14) after the conference, the
10 Parties must submit a stipulated discovery plan and scheduling order;

11 9. Because it is in the best interest of all parties to await the Court's ruling on the
12 Motion to Compel Arbitration prior to setting discovery deadlines and incurring the time and
13 expense of disclosing documents in the event the Court does compel this matter to arbitration, the
14 parties have agreed to stay discovery in this action pending a ruling on the Motion to Compel
15 Arbitration [ECF No. 7].

16 THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the
17 parties, subject to the Court's approval, as follows:

18 a. The parties will meet and confer pursuant to Federal Rule of Civil Procedure
19 26(f) within 30 days of the Court order on Defendants' Motion to Compel
20 Arbitration [ECF No. 7]; and

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b. The parties will file a stipulated Discovery Plan and Scheduling Order within fourteen (14) days after any such Rule 26(f) conference.

DATED this 7th day of March, 2017.

PETERSON BAKER, PLLC

HOGAN HULET PLLC

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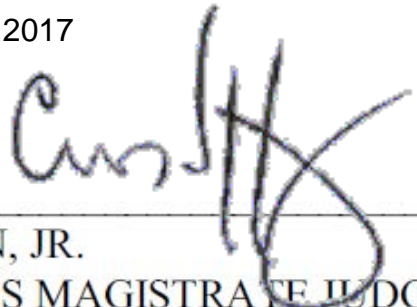
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IT IS SO ORDERED.

DATED: March 8, 2017


C.W. HOFFMAN, JR.
UNITED STATES MAGISTRATE JUDGE

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